

*Tracy Caekaert, et al. v
Watchtower Bible and Tract Society of New York*

*James Rowland
April 23, 2021*

*Charles Fisher Court Reporting
442 East Mendenhall
Bozeman, MT 59715
(406) 587-9016
maindesk@fishercourtreporting.com*

Min-U-Script® with Word Index

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

TRACY CAEKAERT, and Case No.
CAMILLIA MAPLEY, CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY, SR.,

Defendants.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and Cause No.
JAMIE SCHULZE, CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., and
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION
OF JAMES ROWLAND

1 ATTORNEY APPEARING VIA ZOOM ON BEHALF OF THE
2 DEFENDANTS:

3 JOEL M. TAYLOR, pro hac vice
4 Miller, McNamara & Taylor LLP
5 100 South Bedford Road, Suite 340
6 Mount Kisco, New York 10549
7 845.288.0844 - jtaylor@mmt-law.com

8 ALSO PRESENT:

9 JAMIE SCHULZE
10 KATY GANNON
11 SHANNON DEUTSCHER, videographer

12 ALSO APPEARING VIA ZOOM:

13 BRUCE G. MAPLEY, SR.
14 TRACY CAEKAERT
15 CAMILLIA MAPLEY
16 THOMAS SCHULZE

1 BE IT REMEMBERED, that the videotaped
2 deposition upon oral examination of JAMES ROWLAND,
3 appearing at the instance of the Plaintiffs, was
4 taken at the offices of Fisher Court Reporting,
5 2711 1st Avenue North, Billings, Montana, on
6 Friday, April 23, 2021, beginning at the hour of
7 9:17 a.m., pursuant to the Federal Rules of Civil
8 Procedure, before Barbara J. Batts, Registered
9 Merit Reporter, Certified Realtime Reporter, and
10 Notary Public.

11 * * * * *

12 ATTORNEYS APPEARING ON BEHALF OF THE PLAINTIFF:

13 RYAN R. SHAFFER
14 ROBERT L. STEPANS (appearing via Zoom)
15 JAMES C. MURNION (appearing via Zoom)
16 Meyer, Shaffer & Stepans, PLLP
17 430 Ryman Street
18 Missoula, Montana 59802
19 406.543.6929 - ryan@mss-lawfirm.com

20 ATTORNEYS APPEARING VIA ZOOM ON BEHALF OF THE
21 DEFENDANTS:

22 JON A. WILSON
23 AARON M. DUNN
24 Brown Law Firm, P.C.
25 315 North 24th Street
P.O. Drawer 849
Billings, Montana 59103-0849
406.248.2611 - jwilson@brownfirm.com

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7 E X H I B I T S

8 EXHIBITS	DESCRIPTION	PAGE
9 Exhibit 1	Affidavit of James Rowland.....	23
10 Exhibit 2	Document titled "Kingdom 11 Ministry School Course" 12 Bates-numbered WTPA000001 13 through WTPA000136.....	69
14 Exhibit 3	Document titled 15 "Organization for 16 Kingdom-Preaching and 17 Disciple-Making" 18 Bates-numbered 19 Caekaert/Mapley 002834 20 through Caekaert/Mapley 21 003027.....	169
22 Exhibit 4	Document dated December 11, 23 1988 from Governing Body of 24 Jehovah's Witnesses, 25 Bates-numbered Row_Hardin000058.....	219

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1 **THE VIDEOGRAPHER:** This is the
 2 video-recorded and video-conferenced deposition of
 3 James Rowland, taken in the United States District
 4 Court for the District of Montana, Billings
 5 Division, Case No. CV-20-52-BLG-SPW, Tracy Caekaert
 6 and Camilla Mapley versus Watchtower Bible and
 7 Tract Society of New York, Inc., et al., and
 8 Cause No. CV-20-59-BLG-SPW, Ariane Rowland and
 9 Jamie Schulze versus Watchtower Bible and Tract
 10 Society of New York, Inc., et al.

11 Today is April 23rd, 2021. The time is
 12 9:17 a.m. We are present with the witness at the
 13 offices of Fisher Court Reporting, at 2711 1st
 14 Avenue North, Billings, Montana. The court
 15 reporter is Barbara Batts, and the video operator
 16 is Shannon Deutscher, of Fisher Court Reporting.

17 I would now ask the attorneys to identify
 18 themselves, who they represent, and whoever else is
 19 present. For those attending remotely, please note
 20 from where you are appearing.

21 **MR. SHAFFER:** This is Ryan Shaffer
 22 representing all plaintiffs. I'm joined by our
 23 assistant, Katy Gannon, here in person.

24 **MR. TAYLOR:** This is Joel Taylor of
 25 Miller, McNamara & Taylor. I am in New York, and

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1 a witness of lawful age, having been first duly
 2 sworn to tell the truth, the whole truth and
 3 nothing but the truth, testified upon his oath as
 4 follows:

5 **EXAMINATION**

6 **BY MR. SHAFFER:**

7 **Q. Good morning, Mr. Rowland.**

8 A. Good morning.

9 **Q. As you know, I'm Ryan Shaffer. I**
 10 **represent your daughters. And with me is Katy**
 11 **Gannon.**

12 **I know we met for the first time in person**
 13 **this morning.**

14 A. Uh-huh.

15 **Q. "Yes"? And just for your benefit and for**
 16 **the benefit of the court reporter and everybody**
 17 **here, if you can say "yes" and "no" instead of**
 18 **"uh-huh," it helps make a clear record of what**
 19 **we're talking about and what you're saying. Your**
 20 **head nods will be captured on the camera, but it's**
 21 **better if you can say "yes" or "no."**

22 A. Uh-huh. Okay.

23 **Q. Thank you.**

24 **You and I have spoken one time on the**
 25 **phone. I don't know if you recall. It was about a**

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1 I'm appearing on behalf of the Watchtower
 2 defendants in both lawsuits.

3 **MR. WILSON:** Jon Wilson and Aaron Dunn
 4 with the Brown Law Firm. We're also appearing on
 5 behalf of the Watchtower defendants in both cases.
 6 We are in our office in Billings.

7 **MR. STEPANS:** Good morning. This is Rob
 8 Stepans from Meyer, Shaffer & Stepans appearing on
 9 behalf of the plaintiffs. I am in Jackson,
 10 Wyoming.

11 **MR. MURNION:** This is James Murnion,
 12 Meyer, Shaffer & Stepans, on behalf of the
 13 plaintiffs. I am in Missoula, Montana, appearing
 14 remotely.

15 **MR. SHAFFER:** This is Ryan Shaffer, and I
 16 understand that defendant in one of the cases,
 17 Mr. Bruce Mapley, is also on, as I understand it.
 18 And here in the room with me today is one of my
 19 clients, Jamie Schulze. Other clients, Tracy
 20 Caekaert and Cami Gibson, also are listening in
 21 remotely from their locations. I believe Tracy is
 22 in Montana, and I believe Cami is in Australia.

23 **THE VIDEOGRAPHER:** The court reporter will
 24 now administer the oath.

25 **JAMES ROWLAND,**

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1 **month ago. I talked to you about sending you some**
 2 **documents.**

3 A. Uh-huh.

4 **Q. Yeah?**

5 A. Right.

6 **Q. But I don't think we've met before today.**
 7 **So we're here to talk about -- I want to get as**
 8 **much information as I can from you and have a**
 9 **conversation with you about this case and the**
 10 **things that happened in Hardin and in Forsyth.**

11 **You know, we're talking 40, 50 years ago,**
 12 **a long time ago. And so I'm going to ask you**
 13 **questions, and answer them the best you can. You**
 14 **know, I understand that it was a long time ago, and**
 15 **everybody's memory's not perfect. I imagine that's**
 16 **true for you.**

17 A. Yeah, that's true for me.

18 **Q. Yeah. And so if you remember something,**
 19 **but maybe not the exact day or the exact year,**
 20 **that's okay. Just say that. Does that make sense?**

21 A. Yes.

22 **Q. Yeah. So you can say, "Well, I remember**
 23 **this, but it was approximately in 1976, might have**
 24 **been 1977." That's just fine. We just want to get**
 25 **the best memory that you have.**

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1 say?

2 A. Well, I helped with several of his
3 buildings, including a --

4 Q. Would you consider yourself and Martin
5 friends?

6 A. At that time, yes.

7 Q. Do you recall around what year it was
8 built?

9 A. I can't remember right off. I worked on
10 it, though, with a couple other brothers, putting
11 the tile floors down.

12 Q. At any point did any elder tell you that
13 you could not take these allegations to the police?

14 A. No.

15 Q. Have you ever read a publication by
16 Watchtower Bible and Tract Society of New York or
17 Watch Tower Bible and Tract Society of Pennsylvania
18 that has said you could not report abuse to the
19 authorities?

20 A. Not that I know of.

21 Q. I want to take you to Exhibit, I believe
22 it's been marked No. 2. And it is the Kingdom
23 Ministry School Course. I think you spoke
24 earlier -- it should be right in front of you. See
25 if you have Exhibit No. 2.

1 A. Yeah, it's in there.

2 Q. Okay.

3 A. Almost every --

4 Q. I want to draw your attention to page 91.
5 It has a different Bates number, but page 91 of the
6 publication. Let me know when you get to page 91.

7 A. I'm there.

8 Q. Okay. Do you see the subheading "Our
9 Responsibility to God and Caesar"?

10 A. Yes. We referred to that earlier. The
11 worldly law.

12 Q. And so Mr. Rowland, is it your
13 understanding then that the word "Caesar"
14 represents the secular authorities?

15 A. Yes.

16 Q. And that would mean the police and anyone
17 else? It would mean the president of the
18 United States, for example?

19 A. Yes.

20 Q. Now, there is a subheading on the right
21 column that says, "Paying Back Caesar's Things to
22 Caesar." Do you see that?

23 A. Uh-huh.

24 Q. And the first subject says, "Subjection."
25 Could you read that for me? What does it say?

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1 Do you have that in front of you,
2 Mr. Rowland?

3 A. No. You can go ahead and read it to me.

4 Q. Well, if you could pick it up, it would be
5 very helpful. I don't know if it's still
6 available, but it was marked as an exhibit.

7 A. I don't -- is it the Kingdom Ministry
8 School?

9 Q. Yes. Yes.

10 A. Okay.

11 Q. And so you mentioned earlier how pivotal
12 this publication is in connection with your role as
13 an elder. Is this the guidelines that you would
14 use as an elder to carry out your responsibility?

15 A. Part of it.

16 Q. Okay. And there were other printed
17 materials that you would use?

18 A. Yes. This is specifically for kingdom
19 preaching, spreading the --

20 Q. I'm sorry, is that the Kingdom Ministry
21 School Course, Exhibit No. 2?

22 A. Yeah.

23 Q. I thought your earlier testimony was that
24 it was going to help you with the preaching but
25 also to keep the congregation clean.

1 A. "Every Christian must be in subjection to
2 all the laws of the government under which he lives
3 as long as those laws are not in conflict with
4 God's laws."

5 Q. Sure. And how about the next paragraph?

6 A. "Since Jehovah permits secular governments
7 to exercise authority for a while, if we opposed
8 this arrangement we would put ourselves in
9 opposition to God, who has allowed it."

10 Q. What do you understand that to mean?

11 A. Well, from everything from driving a car
12 to driving an airplane is laws, and you have to
13 conform to those laws. And as long as it doesn't
14 conflict with Jehovah's laws. And those are in the
15 congregation committees.

16 Q. So let me ask you, if the government said,
17 "We want you to kill another country or a citizen
18 in another country," would a Christian follow that
19 law?

20 A. Not really.

21 Q. Is that because it conflicts with God's
22 law about the sanctity of life?

23 A. Yeah. Thou shall not kill.

24 Q. Understood. So if the law was in
25 opposition to what the Bible says, you wouldn't